

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15  
16 SAN FRANCISCO DIVISION

17 IN RE: UBER TECHNOLOGIES, INC.,  
18 PASSENGER SEXUAL ASSAULT  
LITIGATION

19  
20 This Document Relates to:

21 *All Cases*  
22  
23  
24  
25  
26  
27  
28

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIALS  
SHOULD BE SEALED [ECF No. 3913]**

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

Having considered statement in support of Plaintiffs' Administrative Motions to Consider Whether Another Party's Material Should Be Filed Under Seal, dated September 15, 2025, ECF 3913 ("Plaintiffs' Motion"), and Defendants' Unopposed Statement in Support of Plaintiffs' Motion, dated September 22, 2025, ECF \_\_\_\_ ("Statement in Support"), the Court hereby ORDERS that the following materials remain under seal as stated in Defendants' Statement in Support:

Document	Description	Defendants' Request
<b>Plaintiffs' Exhibit A</b> to the Letter Brief (ECF 3913-3)	Declaration of Todd Gaddis, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's internal data systems	Seal in part (§§ 5-11 and appendix at pages 5-7)
<b>Plaintiffs' Exhibit B</b> to the Letter Brief (ECF 3913-4)	Defendants' Responses to Plaintiffs' Requests for Production of Documents Set One, containing confidential information about Uber's operations and products	Seal in part (all requests and responses except those cited in the Letter Brief: RFP Nos. 73, 83, 84)
<b>Plaintiffs' Exhibit C</b> to the Letter Brief (ECF 3913-5)	Excerpts of transcript of Defendants' July 11, 2025, 30(b)(6) deposition by Todd Gaddis, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's internal data systems	Seal in part (86:5-93:25)
<b>Plaintiffs' Exhibit D</b> to the Letter Brief (ECF 3913-6)	Documents identifying and describing all fields within Uber's Jira and Bliss systems, designated as Highly Confidential – Attorneys' Eyes Only	Maintain under seal
<b>Plaintiffs' Exhibit E</b> to the Letter Brief (ECF 3913-7)	Document providing detailed supplemental information about Uber's incident report data, categorization, storage, and systems, designated as Highly Confidential – Attorneys' Eyes Only	Maintain under seal
<b>Plaintiffs' Exhibit F</b> to the Letter Brief (ECF 3913-8)	Document providing detailed supplemental information about Uber's incident report data, categorization, storage, and systems, designated as Highly Confidential – Attorneys' Eyes Only	Maintain under seal
<b>Plaintiffs' Exhibit G</b> to the Letter Brief (ECF 3913-9)	Document providing detailed supplemental information about Uber's incident report data, categorization, storage, and systems, designated as Highly Confidential – Attorneys' Eyes Only	Maintain under seal
<b>Plaintiffs' Exhibit H</b> to the Letter Brief (ECF 3913-10)	Email from Plaintiffs' counsel containing confidential information about Uber's incident categorization and data systems	Seal in part (incident report system data fields)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Charles R. Breyer  
United States District Judge